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October 25, 2004

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Room TWB-325
Washington, DC 20554

Re: Docket CG 02-386

Dear Ms. Dortch:

On October 20, Marybeth Banks, Lilli Taylor and Cathy Clucas from Sprint, Lynn Crofton and I from AT&T, Karen Reidy from MCI and by phone Sue Landerman and Jackie Von Schmidt from AT&T, Betty Tavidian from MCI and Dave Thurman from Sprint, met with Jay Keithly, Richard Smith, Lisa Boehley, Gene Fullano and Nathan Olson from the Consumer and Governmental Affairs Bureau to discuss the above referenced proceeding.

The attachment, which was a handout at the meeting, identifies the topics and details of that discussion, and it provided the framework for questions and answers on alternative implementation plans.

One electronic copy of this Notice is being submitted to the Secretary of the FCC in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

A handwritten signature in black ink, appearing to read "M Del Casino".

Attachment

cc: Jay Keithley
Richard Smith
Lisa Boehley
Gene Fullano
Nathan Olson

Mandatory Minimum CARE Standards

**Joint Presentation to FCC by AT&T, MCI, and Sprint
October 20, 2004**

Meeting Goals

- **Size of the problem impacting consumers and carriers**
 - ◆ The universe of local exchange carriers
 - ◆ Number of messages/calls not associated with a customer account
 - ◆ Number of PIC transactions rejected due to resale, UNE-P, and/or number portability
 - ◆ Number of companies that refuse to provide CARE or BNA
- **Discuss CARE Scenarios Presented by BellSouth**

SIZE OF THE PROBLEM

■ The Universe of Wireline Carriers

- ◆ Approximately **3,065** National Wireline Local Carriers identified in the Local Exchange Routing Guide
- ◆ Approximately **40%** exchange some CARE or CARE-like information with the Joint Petitioners
- ◆ Approximately **60%** do not participate in any exchange of CARE information with the Joint Petitioners

SIZE OF THE PROBLEM

- ◆ Average number of all messages/calls not associated with a customer billing name and address — **163,700,000/month**
- ◆ Average number of PIC transactions rejected due to resale, UNE-P, and/or number portability — **863,100/month**
- ◆ Joint Petitioners have identified **60%** of the LEC universe that do not provide CARE or BNA. Based on initial efforts to contact these companies, the number that refuse to provide CARE/BNA is growing.
 - * difficult to identify the underlying carrier
 - * difficult to make contact
 - * no leverage available when they refuse

CARE SCENARIOS

- **Joint Petitioners approach: a national perspective**
 - ◆ Accommodates the known service order processing capabilities of many LECs
 - ◆ Allows the exchange of CARE data with those local companies that do not process all activities in the same manner
 - ◆ Many current LECs already supporting CARE, exchange the TCSIs included in Joint Petitioner's Minimum CARE Standards

CARE SCENARIOS

- **BellSouth's CARE Scenario includes**
 - ◆ 12 codes that represent unique customer activities and the 3 code series used to reject IXC orders supported by Joint Petitioners
 - ◆ A proposal to use single generic codes to identify several unique customer-specific activities
- **BellSouth's CARE Scenarios do not support**
 - ◆ Use of alternative codes
 - ◆ Certain specific critical activities

CARE SCENARIOS

- **Alternative Codes are necessary**
 - ◆ Generic codes do not always provide all critical information
 - ◆ Alternative codes provide necessary flexibility to accommodate multiple LEC processing variations and customer behaviors/requests (e.g., the BellSouth scenarios only support certain codes due to limitations of its service order processes)
- **Joint Petitioners support Alternative Codes**
 - ◆ Widely supported by the industry
 - ◆ Allows pick and choose based on unique order processing systems
 - ◆ Provides specific identification of the customer activity
 - ◆ Tracks customer service and account continuity to avoid billing errors and customer complaints

CARE SCENARIOS

- **Specific critical activities not supported by BellSouth's CARE scenario**
 - ◆ Unique notification of *move* and *change of responsible customer activity*
 - ★ prevents disruption of services, allows customer service and account continuity, ensures accurate billing, and reduces customer complaints [2005/2202 and 2007/2212]
 - ◆ Unique notification of *disconnect of local dial-tone customer activity*
 - ★ avoids continued billing or billing wrong customer when number reassignment occurs [2201]

CARE SCENARIOS

- **Specific Critical Activities – continued**
 - ◆ Unique notification of **change of local service to resale/UNE-P**
 - * prevents disruption of service, allows customer continuity and accurate billing of the IXC services. [2233]
 - ★ Note: there is no other industry process for IXCs to identify when a number has migrated to a resale/UNE-P provider behind the ILEC
 - ◆ Notification of **alleged slam to the authorized carrier**
 - * provides notification that a customer has been returned to the carrier's network as the result of a PIC dispute [2011]
 - * BellSouth supports notification to unauthorized carrier only (2219).
 - * notification to both authorized and unauthorized carriers is necessary to comply with FCC Slamming Rules
 - ◆ Notification of **BNA request** that cannot be provided to the requesting IXC. [26XX]

Recommendation

- Issue an Order to Implement Mandatory Minimum CARE Standards and address issues beyond the scope of this proceeding in FNPRM